



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

April 24, 2007

Ref: NEPA

Robert Thompson
District Ranger
Mystic Ranger District, Black Hills National Forest
8221 South Highway 16
Rapid City, SD 57702

RE: Mitchell Project Draft EIS comments

Dear Mr. Thompson:

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the *Draft Environmental Impact Statement* (DEIS) for the Mitchell project. The Forest Service proposes to aggressively manage vegetation to minimize the potential for large-scale wildfires. Specifically, the primary focus is to reduce the potential for uncontrolled crown fire spread within the wildland-urban interface and near at-risk communities by removing vegetation. The project would implement forest thinning on about 10,600 acres, create fuel breaks along private property boundaries and road corridors on about 500 acres, and reduce pine encroachment into historic meadow on about 1,400 acres. Prescribed burning is also proposed on about 9,000 acres. EPA provides these comments in accordance with our authorities and responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

EPA supports the proposed project's purpose and need to help protect local communities and resources from catastrophic wildfire, and restore resource conditions to a healthy, resilient fire-adapted ecosystem across the project area. We would like to have seen water quality improvement as a component of the project's purpose, considering there are two streams in the Mitchell Project Area (MPA), Spring Creek and Battle Creek, and Sheridan Lake that are currently on South Dakota's 303(d) Waterbody List (Chapter 3, page 49). EPA is concerned about the potential impacts from the proposed actions from additional runoff, erosion and sedimentation to streams and riparian resources. The EIS should clearly describe how the proposed project will be consistent with the State's Total Maximum Daily Load water quality targets for those water bodies. Specifically, the document should describe how the proposed project will impact the Spring Creek's failure to support the use of immersion recreation waters, and Battle Creek and Lake Sheridan's failure to support coldwater permanent fish life.

The proposed alternative includes considerable prescribed burning to reduce fuels and enhance natural fuel breaks. In general, EPA supports the use of prescribed fire for vegetation

management and reduction of hazardous fuels. However, the complex pattern of private residential communities interspersed with the Black Hills National Forest lands raises concerns about human health exposure to pollutants from smoke. Tiny particulates (PM¹⁰ and PM^{2.5}) can cause health problems for people suffering from respiratory illnesses such as asthma or emphysema, or heart problems. The DEIS does not provide information on whether particulate concentrations are meeting or exceeding health standards. The document also does not address whether smoke from prescribed fires will reduce visibility in federally designated Class I (Badlands Wilderness and/or Wind Cave National Park) or Class II areas.

The DEIS also does not include any information about how the Mitchell Project will utilize the cellulosic ethanol plant that is under construction in Upton, SD. The pilot plant is designed to produce one million gallons of fuel a year and could lead to a plant that would eventually produce as much as 20 million gallons of the fuel each year, using wood chips and wood residue as base material. According to BHNF Renewable Resources Staff Officer Dave Thom, the plant will accept slash and small diameter trees from private forest land around Upton, and will haul some wood from slash piles (tree tops and processor piles) from BHNF. The EIS should discuss the quantity of slash that will go to the plant, and estimate the reduced particulate emissions from avoided burning.

EPA evaluates the potential effects of proposed actions and the adequacy of the information in the DEIS. We rate the DEIS an "EC-2" (environmental concerns, insufficient information) under EPA's enclosed ratings criteria. We recommend additional analysis and information to fully assess and mitigate all potential impacts of the management actions.

Our detailed comments are attached. EPA appreciates the opportunity to review and comment on the DEIS and your willingness to consider our comments at this stage of your planning process. If you would like to discuss our comments, please feel free to contact Jody Ostendorf of my staff at (303) 312-7814.

Sincerely,

/s/ Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosure: EPA's Ratings Criteria